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AUG 17 5 32 AM '09
U.S. DISTRICT COURT
LAS VEGAS, NEVADA

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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2:09-mj-00671-LRL

UNITED STATES OF AMERICA

Plaintiff,
vs.

**JAYSON LEE JULIAN,
RYAN STEPHEN NEUFELD,**

Defendants

Case No:

COMPLAINT for violation of Title 18, United
States Code, Section 2113(a) Bank Robbery

BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned complainant, being first duly sworn, deposes and says: that on or about August 14, 2009, in the state and Federal Judicial District of Nevada, **JAYSON LEE JULIAN** and **RYAN STEPHEN NEUFELD**, defendants herein, by force and violence and by intimidation, did take from the person and presence of Anna Rashminder Gulati, Bank of America, 8581 W. Lake Mead, Las Vegas, Nevada, approximately nine hundred one (\$901.00) in United States currency belonging to and in the care, custody, control, management and possession of the Bank of America, the deposits of which were then insured by the Federal Deposit Insurance Corporation, all in violation of Title 18, United States Code, Section 2113(a).

Complainant, as a Special Agent for the Federal Bureau of Investigation, states the following as and for probable cause:

1. Complainant is a Special Agent with the Federal Bureau of Investigation, currently assigned

1 to the Las Vegas, Nevada field office, and has been so employed for approximately fifteen (15) years.

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3 2. The following information is either the result of complainant's own personal investigation,
4 or has been provided to him by other law enforcement personnel:

5 (a) At approximately 5:15 PM, August 14, 2009, two white male adults, later identified as
6 **JAYSON LEE JULIAN** and **RYAN STEPHEN NEUFELD**, entered the Bank of America, Las Vegas,
7 Nevada.

8 (b) The two bank robbers approached the victim teller; one of them told her not to say anything,
9 and showed her a note which read, in part, "YES THIS IS REAL. I want the money. I am armed."

10 (c) The teller took money and a electronic tracker from her drawer and put it in the money pouch
11 provided by the robber. The robber instructed her not to activate her alarm until they had left, and told
12 her to have a nice day, after which the two robbers left the bank.

13 (d) The teller activated her alarm. Officers of the Las Vegas Metropolitan Police (LVMPD) and
14 agents of the FBI immediately responded and followed the tracker signal to 1109 Cahill Street, in Las
15 Vegas, Nevada.

16 (e) At approximately 6:45PM on August 14, 2009, agents of the FBI and officers of the LVMPD
17 called a male and a female out of the house. The female was identified as Barbara Artiaga, the resident
18 of 1109 Cahill; the male was her boyfriend, who initially provided a false identification but subsequently
19 admitted to being **JAYSON LEE JULIAN. JULIAN**, who was taken into custody, appeared identical
20 to photographs of the robber as captured by surveillance cameras inside the Bank of America, except
21 for his lack of a goatee.

22 (f) At approximately 8:20 PM, on August 14, 2009, agents of the FBI interviewed **JAYSON**
23 **LEE JULIAN**, who after receiving his Miranda Warnings, voluntarily advised that he robbed the Bank
24 of America on this date, and identified **RYAN STEPHEN NEUFELD** as the second robber. **JULIAN**
25 admitted to shaving off his goatee after arriving at 1109 Cahill.

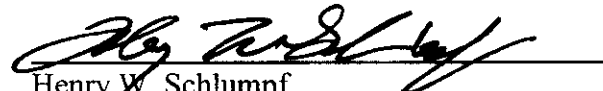
26 (g) At approximately 10:30PM, on August 14, 2009, **RYAN STEPHEN NEUFELD** attempted

1 to escape from the rear of 1109 Cahill, and was apprehended. **NEUFELD**, who appeared identical to
2 the second robber as photographed by bank surveillance cameras, was taken into custody.

3 (h) At approximately 10:51 PM, on August 14, 2009, agents of the FBI interviewed **RYAN**
4 **STEPHEN NEUFELF**, who after receiving his Miranda Warnings, voluntarily advised that he robbed
5 the Bank of America on this date, and provided seven hundred thirty dollars (\$730.00) of the bank
6 robbery proceeds.

7 (i) At approximately 11:00 PM, on August 14, 2009, officers of the LVMPD obtained a search
8 warrant and conducted a search of the residence and vehicles located at 1109Cahill. Among items
9 recovered were sunglasses that appeared identical to the ones worn by the first robber, as depicted in the
10 bank surveillance photographs, and the hat worn by the second robber.

11 (j) A representative of Bank of America stated that the loss to the bank from the robbery was nine
12 hundred one dollars (\$901.00) and that the deposits of Bank of America are, and were on August 14,
13 2009, insured by the Federal Deposit Insurance Corporation.

14
15 
16 Henry W. Schlumpf
Special Agent

17 SUBSCRIBED and SWORN to before me
18 this 15th day of August, 2009

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21 UNITED STATES MAGISTRATE JUDGE
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